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May 9, 2006

**VIA ELECTRONIC FILING**

The Honorable Kent A. Jordan  
United States District Court  
For the District of Delaware  
844 North King Street  
Wilmington, Delaware 19801

Re: In Re '318 Patent Infringement Litigation, C.A. No. 05-356-KAJ

Dear Judge Jordan:

We represent the Dr. Reddy's defendants and submit this brief letter to correct a misimpression left by the May 8 interim status report letter submitted unilaterally by plaintiffs' counsel. Plaintiffs assert at page four of their letter that Dr. Reddy's offered to produce their Rule 30(b)(6) witness contrary to the Court's Order that witnesses be produced in time for Rule 30(b)(6) depositions to be completed by May 12. Plaintiffs ignore the fact that the May 19 date was arranged before the Court's Order.

In particular, Dr. Reddy's identified its 30(b)(6) witness, Seshu Akula, and offered the May 19 deposition date before 5:00 p.m. on March 31, long before the April 12 and April 17 conference calls with the Court which established the May 12 deadline. Prior to the conference calls with the Court, plaintiffs did not raise the May 19 date in their correspondence with Dr. Reddy's counsel, nor did they raise an issue with the date in their March 31 letter motion to the Court to compel discovery. Finally, during the April 12 teleconference with the Court, plaintiffs stated that they did not have any outstanding issues with Dr. Reddy's. (Tr. 40:19-41:2). Plaintiffs' attempt to create an issue when they previously told the Court there was none should be rejected.

Respectfully,

*/s/ David E. Moore*

David E. Moore

DEM:nmt/731478

cc: Clerk of the Court  
Counsel of Record